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7 *Attorneys for BC Licensing, LLC*  
8 *BCIP, LLC, JRS Hospitality, LLC,*  
9 *Perry Rogers, Shaquille O'Neal, Corey Jenkins,*  
10 *Joshua Halpern, Matthew Silverman, and*  
11 *Samuel Stanovich*

12 **UNITED STATES DISTRICT COURT**

13 **DISTRICT OF NEVADA**

14 BC LICENSING, LLC, a Nevada limited liability  
company,

15 Plaintiff,

16 v.

17 DMD CHICKEN, LLC, a Florida limited  
liability company; FREDERICK BURGESS, an  
18 individual; and JACK FLECHNER, an  
individual,

19 Defendants.

20 DMD CHICKEN, LLC, a Florida limited liability  
company,

21 Counterclaim-Plaintiff,

22 v.

23 BC LICENSING, LLC, a Nevada limited liability  
company; BCIP, LLC, a Nevada limited liability  
24 company; JRS HOSPITALITY, LLC, a Nevada  
25 limited liability company; PERRY ROGERS, an  
26 individual; SHAQUILLE O'NEAL, an  
27 individual; COREY JENKINS, an individual;  
JOSHUA HALPERN, an individual;  
28 MATTHEW SILVERMAN, an individual; and

Case No. 2:25-cv-00453-CDS-NJK

**ORDER TO EXTEND THE DEADLINE  
FOR BC LICENSING, LLC TO  
RESPOND TO THE COUNTERCLAIM**

1 SAMUEL STANOVICH, an individual,  
 2 Counterclaim Defendants.  
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4  
 5 IT IS HEREBY STIPULATED, between Plaintiff/Counter-Defendant BC LICENSING, LLC  
 6 (“BC Licensing”), counter-defendants BCIP, LLC, JRS HOSPITALITY, LLC, PERRY ROGERS,  
 7 SHAQUILLE O’NEAL, COREY JENKINS, JOSHUA HALPERN, and MATTHEW SILVERMAN  
 8 (collectively “Counter-Defendants”), Defendant/Counterclaimant DMD CHICKEN, LLC (“DMD”),  
 9 and defendants Frederick Burgess and Jack Flechner, by and through their respective undersigned  
 10 counsel, as follows:

11 1. On March 18, 2025, DMD, Frederick Burgess, and Jack Flechner filed their answer  
 12 and DMD filed its counterclaim against BC Licensing and the Counter-Defendants. *See* ECF No. 6.

13 2. On March 24, 2025, DMD filed proposed summonses for the Counter-Defendants.  
 14 *See* ECF Nos. 10, 11, 12, 13, 14, 15, 16, and 17.

15 3. BC Licensing and the Counter-Defendants are represented by the same undersigned  
 16 counsel and envisioned coordinating their response to the counterclaim as a matter of efficiency.

17 4. On March 28, 2025, counsel for BC Licensing and the Counter-Defendants advised  
 18 counsel for DMD that it could accept service of the summons and Counterclaim for the Counter-  
 19 Defendants.

20 5. On April 1, 2025, counsel for DMD advised that DMD was still waiting for the  
 21 summonses to be issued.

22 6. The summonses for the Counter-Defendants were finally issued on April 7, 2025, the  
 23 day before BC Licensing’s response to the Counterclaim was due. *See* ECF Nos. 25-1-7.

24 7. BC Licensing seeks an extension to give it more time to prepare a response to the  
 25 Counterclaim and to coordinate such response to the Counterclaim with that of the other Counter-  
 26 Defendants, who are represented by the same counsel.

27 8. The Counter-Defendants have 21 days under FRCP 12(a)(1)(B) from April 9, 2025,  
 28 the date of service of the summons and counterclaim.

9. The Parties therefore stipulate that the deadline for all Counter-Defendants, including BC Licensing, will be April 30, 2025.

10. This stipulated extension is not sought in bad faith or for the purpose of delaying the proceedings.

This is the first request to extend the deadline for BC Licensing to respond to the Counterclaim.

Dated this 10<sup>th</sup> day of April 2025.

Dated this 10<sup>th</sup> day of April 2025.

**GREENBERG TRAUERIG, LLP**

**BAILEY KENNEDY**

By: /s/ Akke Levin

By: /s/ Joseph A. Liebman

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*Attorneys Defendant/Counter-Plaintiff DMD Chicken, LLC and defendants Frederick Burgess and Jack Flechner*

IT IS SO ORDERED:

  
UNITED STATES MAGISTRATE JUDGE

Dated: April 11, 2025